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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,
13
14 v.
15 EDGAR RAFAEL NAVARRO CHAVOYA,
Defendant.

CASE NO. 1:21-CR-00314-JLT-SKO

STIPULATION TO CONTINUE STATUS
CONFERENCE AND EXCLUDE TIME UNDER
SPEEDY TRIAL ACT; ORDER

DATE: April 20, 2022
TIME: 1:00 p.m.
COURT: Hon. Sheila K. Oberto

16
17 **STIPULATION**

18 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
19 through defendant's counsel of record, hereby stipulate as follows:

- 20 1. By previous order, this matter was set for status on April 20, 2022.
- 21 2. By this stipulation, defendant now moves to continue the status conference until July 20,
22 2022, and to exclude time between April 20, 2022, and July 20, 2022, under Local Code T4.
- 23 3. The parties agree and stipulate, and request that the Court find the following:
 - 24 a) The government has represented that the discovery associated with this case has
25 been either produced directly to counsel and/or made available for inspection and copying.
 - 26 b) Counsel for defendant desires additional time to consult with her client, to review
27 the current charges, to conduct investigation and research related to the charges, to review and
28 copy discovery for this matter, and to discuss potential resolutions with her client.
 - c) Counsel for defendant believes that failure to grant the above-requested

continuanace would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of April 20, 2022 to July 20, 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: April 12, 2022

PHILLIP A. TALBERT
United States Attorney

/s/ LAURA D. WITHERS
LAURA D. WITHERS
Assistant United States Attorney

Dated: April 12, 2022

/s/ ERIN M. SNIDER
ERIN M. SNIDER
Counsel for Defendant
EDGAR RAFAEL NAVARRO
CHAVOYA

ORDER

IT IS SO ORDERED.

DATED: 4/12/2022

Sheila K. Oberto

THE HONORABLE SHEILA K. OBERTO
UNITED STATES MAGISTRATE JUDGE